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June 29, 2021

The Honorable Loretta A. Preska
United States District Judge, Southern District of New York
United States Courthouse, Courtroom 12A
500 Pearl Street
New York, NY 10007-1312

Re: *Berall v. Verathon Inc. et al.*, C.A. No. 1:10-CV-05777-LAP-DCF

Dear Judge Preska:

I write on behalf of Defendants Verathon Inc. ("Verathon") and Teleflex Medical Incorporated ("Teleflex") (collectively, "Defendants"). Pursuant to Your Honor's Individual Practices, Defendants seek an order permitting Defendants to file the following document under seal:

- An unredacted copy of Defendants' Letter Reply in Support of Defendants' Letter Motion for Pre-Motion Conference Regarding Motion to Compel Production of Waived Privileged Documents ("the Letter Motion"), filed on June 25, 2021.

The redacted portions of the Letter Motion contain information regarding terms of settlement agreements between Berall and certain third party companies.

Courts in this district have routinely ordered that documents referencing the terms of settlement agreements be filed under seal. *See, e.g., Cosmoosl Corp. et al. v. C-Callon. Inc. et al.*, 11-cv-1922 (S.D.N.Y. May 19, 2011), Dkt. No. 33; *Cosmoosl Corp. et al. v. C-Callon. Inc. et al.*, 11-cv-1922 (S.D.N.Y. July 25, 2011), Dkt. No. 66; *Seoul Viosys Co., Ltd. v. P3 Int'l Co.*, 16-cv-6272 (S.D.N.Y. Sept. 30, 2018), Dkt. No. 164 at 26-27.

Accordingly, Defendants respectfully request that this Court enter an order that the Letter Reply may be filed under seal.

Sincerely,
/s/ Thad C. Kodish
Thad C. Kodish
Counsel for Verathon Inc.



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/s/ Jonathan R. Wise
Jonathan R. Wise
Counsel for Teleflex Medical Incorporated

cc: Counsel of Record

Defendants may file the proposed documents
under seal.

SO ORDERED.

Dated: September 21, 2021
New York, New York



LORETTA A. PRESKA, U.S.D.J.